

Citizen Participation in Housing and Community Development:

A Handbook for Planning, Decision Making,
Implementation, and Evaluation.

State of Tennessee
Housing and Community Development
Citizen Participation Plan and Handbook
2005

Lead Agency

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Introduction

This handbook is a guide for housing and community development professionals who work with citizens to develop and carry out citizen participation activities within the wider context of development policies and programs. It will also serve to: provide a better understanding of the citizen participation process; define responsibilities of development professionals at several levels; apply experience and research in citizen participation program development to housing and community development work.

Effective citizen participation plan development is based on the philosophy that people have both the desire and ability to plan and carry out development programs to enrich their lives. The degree to which this is accomplished depends on people having opportunities to learn and apply knowledge, imagination, and experience toward solving mutual problems. This handbook suggests sound and proactive ways to develop programs and plans using a citizen participation process.

Experience has proven that effective development programs can be achieved only with the support and involvement of citizens.

Some major benefits of a citizen participation plan as part of the program development process are:

1. It keeps development professionals in direct touch with the people that programs are designed to benefit (program beneficiaries).
2. It increases the quality and effectiveness of programs because the knowledge, creativity, and leadership skills of many people are utilized. People feel a greater responsibility for the success of programs when they help to develop them.
3. The involvement of citizens multiplies the efforts of development professionals and produces more successful programs than professionals could produce alone.
4. It provides for continuous evaluation in which people determine program progress and set new objectives to keep programs going in the right direction.
5. It provides a means of coordinating programs with other groups, organizations, or agencies that are addressing problems of the same or similar nature.
6. It helps to identify resources needed to conduct effective programs and to legitimize these needs.
7. It will help people develop their confidence and leadership. People will have an opportunity to satisfy their basic needs to participate as members of a group, render service, and receive recognition.

Purpose

The Consolidated Plan combines the planning, application, and reporting processes for four existing HUD formula grant programs: the Community Development Block Grant (CDBG), the Emergency Shelter Grant (ESG), the HOME Investment Partnership Program (HOME), and the Housing Opportunities for Persons with AIDS Program (HOPWA).

This handbook is a guide and reference for the development of these programs. It contains information related to national and state housing and community development policy regarding citizen participation and program development.

The Consolidated Plan examines the current housing situation, explores the housing and community development needs of the State, and sets priorities for spending HUD grant monies. A vital component of exploring the State's housing and community development needs and setting spending priorities is the participation of citizens. The development of the State's Consolidated Plan will offer local organizations, and citizens the opportunity to play an active and vital role in the process of statewide strategic planning.

We believe that the involvement of local organizations and people is essential to the development of effective programs. It is expected that this handbook will be a valuable tool for meeting the challenge of working in partnerships with citizens to provide sustainable housing and community development opportunities for Tennessee's communities.

The citizen participation plan is designed to encourage citizens to:

1. Participate in the development of the consolidated plan;
2. Participate in any substantial amendments to the consolidated plan;
3. Participate in a review and comment process for the annual performance evaluations and reports.

The intended outcome of the consolidated planning process is the integration of the broad base of knowledge and expertise of citizens with workers in the housing and community development fields. Together, state agencies and community-based organizations are one of the State's most valuable assets - a major investment of resources in the State's future. The State's consolidated plans can help maintain a good return on that investment by responding to Tennesseans' varied needs for economic growth and stability.

Future program efforts will focus in four areas: providing decent housing; providing a suitable living environment; providing expanded economic opportunity; improving the effectiveness of programs.

Tennessee Consolidated Plan will use a priority-focused planning process that will coordinate housing and community development activities among program units throughout the State and encourage solution-oriented, multidisciplinary programs. This will require a planning and management process that is appropriate for the complexity of the organizational structure, the changing external factors influencing programs, and the need to be accountable for the public and private resources it has been granted or that it will coordinate.

Mission of the Citizen Participation Plan

1. Identify Tennessee's current and anticipated housing and community development needs and capacities.
2. Provide a systematic analysis of the state housing market including:
 - a. characteristics of households and the housing stock;
 - b. estimates of housing problems, particularly low and moderate income households;
 - c. diagnosis of market imbalances underlying the problems.
3. Provide a factual basis for local programmatic strategies and spending priorities.
4. Provide a factual basis for state programmatic strategies and spending priorities.
5. Provide evidence to inform state and local decision makers about which housing market and community development problems warrant intervention.
6. Provide evidence to inform state and local decision makers about how scarce resources should be allocated between different housing and community development activities, needs, and initiatives.
7. To explore meanings and implications of housing market conditions for local and state policy choices.
8. To provide basic information about housing conditions and community development trends at the national, state, regional, county, and community levels.
9. To serve as a benchmark against which local communities, state agencies, and advocates can compare their housing and community development concerns and situations.
10. To provide illustrations, by highlighting key national, state, and regional variations of ways communities and states encourage citizen participation to develop strategies for addressing problems, needs, and capacities.
11. To discuss ways in which systematic housing market analysis and community needs/capacities surveys can inform local debate about housing needs, community priorities, and mechanisms for public and private sector involvement.
12. To create a dynamic plan of work derived from a long-range vision of the future.

13. To create incremental, achievable activities that cause small successes and encourage further participation, leading to eventual accomplishment of the long- range vision.

Creating a Context for Planning and a Basis for Citizen Participation

Planning Assumptions

1. The capacities of people within the neighborhoods and communities of the state should provide a basis for development rather than continuing dependencies on outside resources, expert advice, technology, and financial aids.
2. Successful programs anticipate change, thereby increasing options for action.
3. A wholistic focus rather than a piecemeal approach to problems and challenges can produce more effective results.
4. Long-term, sustainable development models provide a better framework for planning than do short-term relief programs.
5. Programs administered as resources for change rather than a service for predetermined and prepackaged needs and situations are more productive.
6. Plans and programs that reflect relevancy to the daily lives of citizens and are based on human relationships rather than technological solutions to human problems will prove more effective and productive.
7. Plans and programs should be developed from the bottom-up being inclusive and accessible and reflecting a collective ability to act as a team, rather than from the top-down.
8. Innovation is valued above maintenance: planning and programming for what could be, instead of maintenance of the way things are.

Coordination and Leadership

If consolidated planning in Tennessee is to be effective, participants in the process must be guided by common vision, a clear mission, and a solid resolve to learn new approaches to old and persistent problems.

The best planning strategy is a collaborative effort by state and local institutions, community groups, citizens, and government officials. Developing partnerships among these interests, both in and out of government, would ease community-building efforts and problem solving for the Tennessee Consolidated Plan. One

of the most important aspects of this role is finding methods to expand the structural base of consolidated planning to include more participants in the process.

The Plan offers leadership toward a unified planning approach for Tennessee in the following ways:

Mission: Helping Tennesseans create communities of opportunity.

Unified Approach: A unified planning approach requires that assistance by HUD not be viewed as a laundry list of separate programs. Help provided to Tennessee by HUD should be seen as an invitation to the state to develop and embrace a comprehensive vision of housing and community development. By doing so, Tennessee's communities will become better places to live and work.

Elements of the Comprehensive Vision: A comprehensive and intelligent plan should include affordable housing, adequate infrastructure, fair housing, opportunity for economic growth coordinated with human development.

Tennessee has identified resources and capacities to deal with housing and community development change. In addition, Tennessee maintains that housing and community development planning and programming is best accomplished through a unified and comprehensive vision of the future. A common vision of the future in Tennessee can open new opportunities for collaboration and collective problem solving. Partnerships among state agencies and among government and private organizations must be developed to build a framework that will enable the achievement of the visions and goals of the plan.

Preparing for the Consolidated Plan in Tennessee

The overarching mission of the consolidated planning process is to help Tennesseans build communities of opportunity. Our communities are witnesses to an enormous tangle of problems in such areas as education, public safety, housing, infrastructure, health, and employment that seem to grow in their complexity each year. The enormity of problems is matched, however, by opportunity for success. The deciding factor depends on the human element: how well community members build understanding and action toward solutions.

Community and statewide problems are first and foremost human problems. The willingness to recognize, understand, and take action on community and statewide issues is in question. As Tennesseans plan and work to build communities of opportunity, they must concentrate on what new skills, new attitudes, and new values are necessary to live in a global community of change. This may require shifting the way problems have been viewed in the past and looking to develop resources and capacities yet to be discovered within the

community. It has been said anonymously that, "Discovery is seeing what everyone has seen and thinking what no one else has thought."

The Process

The Tennessee Housing Development Agency (THDA) received designation as the lead agency for the Consolidated Planning process from Governor Ned R. McWherter in September 1994. That designation continues in affect for the current Consolidated Plan.

A working committee was organized to gather and analyze housing and community development data about Tennessee. This committee became the Consolidated Planning Team. The planning team was assisted in their work by existing plans, strategies, and vision documents of federal and state agencies, regions, local communities, and private organizations. Members of the planning team consulted individuals and constituent groups to compile a statement of needs and prepare an analysis of conditions that may require intervention and assistance.

In addition to the planning team the state conducted a series of meetings throughout the state to give communities opportunity for greater input into the Consolidated Plan. Comments and input from these meetings were used to determine need and set goals for the programs. The community meetings were coordinated through the nine Development Districts of the State who assisted in placing notices in newspapers, sending letters, contacting local groups, making follow-up calls and setting up meeting sites.

Consultation

When preparing the consolidated plan, the state will consult with public and private agencies that provide assisted housing (including any State housing agency administering public housing), health services, social services, affordable housing advocates, and housing and community development trade associations,. This consultation will include those agencies focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, economically and socially disenfranchised and impoverished persons.

When preparing the lead-based paint hazards portion of the plan, the state will consult with health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

When preparing the method of distribution of assistance under the CDBG program, the State will consult with local governments in non-entitlement areas of the State.

Consultations will be carried out by each state agency participating in the consolidated planning process. The State intends to provide for and encourage citizens to participate in the consultation phase of the consolidated plan. In addition, citizens are strongly encouraged to develop on-going communication with state agencies providing assistance in their community building process. Each state agency and each community has varying communication styles. Some of the activities that will contribute to successful consultations should include:

Community outreach and education activities.
General informational mailings and announcements.
Public hearings.
Marketing publications.
Workshops.
Technical assistance seminars.
Solicitation of appropriate advocacy group participation.
Encouragement of community-based citizen participation activities.
Survey questionnaires.
As available, the use of electronic media and telecommunication aids to facilitate citizen participation, including but not limited to electronic mail, and the State of Tennessee/THDA web page.

Encouragement of Citizen Participation

The State intends to provide for and encourage citizens to participate in the development of the Consolidated Plan, and in substantial amendments to the Consolidated Plan, and all annual performance evaluations and reports in the interim. The State will take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

Activities will include traditional and nontraditional forms of community and citizen participation and will be designed to be appropriate for the type of citizen participation needed. Potential activities include are outlined above in the section title Consultation.

Communities and citizens are encouraged to seek out opportunities to appropriately contribute to community building activities in their neighborhood or community.

The State will design citizen participation activities to especially encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used and by residents of predominantly low- and moderate-income neighborhoods as defined by the State.

Citizens and Local Government Comment on the Citizen Participation Plan and Amendments

The State will provide citizens and units of general local government a period of 15 calendar days to comment on the citizen participation plan and on substantial amendments to the citizen participation plan. The State will make the citizen participation plan public and in a format accessible to persons with disabilities, upon request.

Development of the Consolidated Plan

The following requirements will be included for the development of the consolidated plan.

- ☐ Prior to adoption of the Consolidated Plan, the State will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the State expects to receive and the range of activities that may be undertaken. The plan will also include the estimated amounts that will benefit persons of low- and moderate-income and the plans to minimize displacement of persons and to assist any persons displaced. This information will be made available through traditional and non- traditional activities and mediums for a period of 15 calendar days. The requirement will be met by publishing a summary of the proposed consolidated plan in newspapers serving the largest population centers in the State and by making copies of the proposed consolidated plan available at public, accessible places such as libraries, government offices, and in electronic format.
- ☐ The State will publish the proposed consolidated plan in a manner that affords citizens, units of general local government, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The State will publish the proposed consolidated plan in both print and electronic formats and give citizens a period of 30 calendar days to examine the contents of the proposed consolidated plan. The requirement will be met by publishing a summary of the proposed consolidated plan in newspapers serving the largest population centers in the State and by making copies of the proposed consolidated plan available at government offices, in electronic format,

and other public places. The summary will describe the content and purpose of the consolidated plan, and include a list of the locations where copies of the entire proposed consolidated plan may be examined or read. In addition, the State will provide a reasonable number of free copies of the plan to citizens and groups that request it.

- ☐ At a minimum, the State will conduct at least one public hearing on housing and community development needs before the proposed consolidated plan is published for comment.
- ☐ The State recognizes that any single activity or format will not adequately address the need for increased citizen participation. State agencies will offer a variety of opportunities and activities to encourage broad-based community participation in housing and community development projects. State agencies encourage the meaningful involvement of citizens because citizen participation contributes to the near term success and long term sustainability of development projects.
- ☐ Adequate advance notice of the hearing will be given to citizens with sufficient information published about the subject of the hearing to permit informed comment. Advanced notice will be made through the print and electronic media at least 15 calendar days prior to the hearing. Small print notices in the newspaper a few days before the hearing will not constitute adequate notice and will not be used.
- ☐ The hearing will be held at a time and location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities. All sites for public hearings will be accessible to persons with physical disabilities. Arrangements for persons with other types of disabilities will be made as requested in advance by any citizen wanting to attend. The advertisement for the hearing will contain a statement of nondiscrimination and the name of a contact person for special accommodation required for persons with disabilities.
- ☐ In the case of public hearings, the needs of non-English speaking residents will be met where a significant number of non-English speaking residents could be reasonably expected to participate. As with persons with disabilities, arrangements for non-English speaking citizens will be made if adequate advance notice is received from such citizens by the State. With adequate advance notice, arrangements for their full participation in the public hearing will be made. The advertisement for the hearing will contain a statement of nondiscrimination and the name of a contact person for special accommodation required for non-English speaking persons.

- A period of 30 calendar days will be allowed to receive comments from citizens and units of general local government on the proposed consolidated plan.
- The State will consider any comments or views of citizens and units of general local government received in writing, or orally at the public hearing, in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final consolidated plan. Officially received comments will be forwarded by the lead agency to the most appropriate agency for response. The lead agency and the responding agency will work together to prepare the comments for acceptance or the reasons for non-acceptance.

It is highly probable that many of the above requirements relative to the development of the State's consolidated plan will be accomplished through the electronic media and similar methods not yet fully developed by state government.

Amendments and Criteria for Substantial Amendments to the Consolidated Plan

This part of the citizen participation plan outlines the criteria the State will use for determining what changes in the State's planned or actual activities constitute a substantial amendment to the consolidated plan.

The State will consider any comments or views of citizens and units of general local government received in writing when preparing amendments to the consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final amendment. Officially received comments will be forwarded by the lead agency to the most appropriate agency for response. The lead agency and the responding agency will work together to prepare the comments for acceptance or the reasons for non-acceptance. A period of 30 calendar days will be provided to receive comments on a substantial amendment before the amendment is implemented.

Amendments to the Consolidated Plan

The State cannot operate federal grant programs in a manner that is inconsistent with Federal Regulations. This implies that the base for establishing criteria for substantial amendments is conformity with the Federal Regulations. The State has flexibility for program operation only within the confines of the governing Federal Regulations.

Table A: Presents criteria for substantial and non-substantial amendments to the consolidated plan. It should be noted that substantial amendment criteria as shown in the first column, are those changes that affect the core values of the consolidated plan and process. These values keep guard over the comprehensive nature and citizen participation process used to develop the State's housing and community development policies. Changes to these core concepts are considered substantial and serious because they reflect a redirection of State housing and community development policy, objectives, and action steps.

The second column in Table A has criteria for non-substantial amendments. Non-substantial amendments relate directly to the daily operation and administration of grant programs by State agencies. These amendments are important but do not reflect a redirection of State housing and community development policy, objectives, and action steps.

Table A. Criteria for Substantial and Non-Substantial Amendments.

<u>Substantial Amendments</u> - <i>subject to a citizen participation process, made public and officially submitted to HUD</i>	<u>Non-substantial Amendments</u> - <i>amendment to be made public and officially submitted to HUD</i>
To change or alter Part III, the strategic plan portion of the consolidated plan.	To change, alter, update, rewrite, correct, or clarify Parts I, II, IV, or V of the consolidated plan to more effectively or efficiently implement Part III, the strategic plan portion of the consolidated plan.
To change the method of distribution of funds for the implementation of the priority needs and action steps of the State as written in Part III, the strategic plan portion of the Consolidated Plan.	To change the actual distribution of funds as a result of Federal budget adjustments of any kind.

Performance Reports

Citizens will be given an opportunity to comment on performance reports. The State will provide a summary of the performance report to the public at least 15 calendar days prior to submission to HUD.

The State will consider any comments or views of citizens received in writing when preparing the performance report. The State will consider any comments or views of citizens and units of general local government received in writing in preparing the final performance report.

A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final performance report submission. Officially received comments will be forwarded by the lead agency to the most appropriate agency for response. The lead agency and the responding agency will work together to prepare the comments for acceptance or the reasons for non-acceptance.

Citizen Participation Requirements for Local Governments

This portion of the citizen participation plan relates only to the citizen participation requirements for units of general local government receiving CDBG funds from the State.

Local governments shall be required to hold two public meetings. These meetings must be advertised in the local newspaper at least 10 calendar days prior to the date of the meeting. The advertisement must contain a statement of nondiscrimination and the name of a contact person for special accommodation required for persons with disabilities. All meeting places must be accessible to persons with disabilities.

The first meeting shall be designed to solicit information about community needs and how CDBG funds can best address those needs. To ensure compliance with Title VI of the Civil Rights Act of 1964, applications must make an additional effort to secure minority participation in this process. A summary of those efforts must be included in the application for funds. Communities shall present information about what activities are eligible, how much money is available, and what kinds of projects are being considered. The second public meeting occurs after the project is complete and is to discuss the accomplishments of the project.

Availability to the Public

The Consolidated Plan as adopted, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The State will make these documents available to the public upon request, at libraries, local development district offices, through distribution to trade and advocacy organizations, and all other practicable and accessible means requested.

Access to Records

The State will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records related to the State's 2005 Consolidated Plan. These same groups will also have access to the planning process for developing the State's Consolidated Plan and the State's use of assistance under the programs covered by this part during the preceding five years. All requests for access to records shall be made in writing through the lead agency: Tennessee Housing Development Agency, 404 James Robertson Parkway, Suite 1114 - RPTS, Nashville, Tennessee 37243-0900.

Concerns

The State will provide for an appropriate and practicable procedure to handle concerns and complaints from citizens related to the Consolidated Plan, amendments, annual performance reports, and the State's future consolidated planning process.

All written concerns and complaints from citizens related to the Consolidated Plan, amendments, annual performance reports, and the Consolidated Planning process shall be made to: Consolidated Plan Lead Agent, Tennessee Housing Development Agency, 404 James Robertson Parkway, Suite 1114 - RPTS, Nashville, Tennessee 37243-0900. The Lead Agent will act as a clearinghouse for any written concerns received and direct them to the most appropriate agency or organization for a response.

The State will provide a timely, substantive written response to every written citizen concern or complaint, within 15 working days, where practicable.

Use of Citizen Participation Plan

The State will follow its citizen participation plan and any subsequently approved amendments.